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October 6, 2021

VIA ECF

Honorable Arlene Rosario Lindsay
United States Magistrate Judge
United States District Court
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, New York 11722

Re: *Robert Goldblatt v. New York Institute of Technology,*
2:18-cv-00265 (DRH)(ARL)

Dear Judge Lindsay:

This firm represents defendant New York Institute of Technology ("NYIT") in this action. I write on behalf of counsel for the parties to respectfully request a two-month extension of the parties' deadline to complete discovery from October 8, 2021 until December 8, 2021. The parties require additional time to complete depositions, particularly as Plaintiff now resides out of New York State. This is the parties' second request for an extension of the discovery schedule.

Should Your Honor grant the parties' request for an extension of the discovery deadline, counsel for the parties respectfully request that the October 22, 2021 deadline to take the first step in any dispositive motion practice be adjourned to December 22, 2021. Counsel for the parties also respectfully request that the final conference before Your Honor on November 4, 2021 be adjourned until a date that is convenient to Your Honor after the end date of discovery.

Thank you for Your Honor's consideration of the parties' request.

Respectfully Submitted,

CLIFTON BUDD & DeMARIA, LLP
Counsel for NYIT

By: *Stefanie Toren*
Douglas Catalano
Stefanie Toren

Enc.

cc: Gregory A. Tsonis, Esq.